

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE

In re:

CLAUDIA G. GABRIELLE,

Debtor.

CHAPTER 7
CASE NO. 18-10524-BAH

OLGA L. GORDON, CHAPTER 7 TRUSTEE
FOR THE ESTATE OF CLAUDIA G.
GABRIELLE,

Plaintiff,

v.

AP No. 18-1062

KINGDOM COMMUNICATIONS, INC.,
BARBARA BROWN a/k/a BARBARA VOLZ
a/k/a BARBARA TAYLOR,

Defendants.

AMENDED COMPLAINT

Olga L. Gordon, Chapter 7 Trustee for the bankruptcy estate of Claudia G. Gabrielle, brings this Amended Complaint to recover property transferred by the Debtor to Kingdom Communications, Inc. and Barbara Brown pursuant to 11 U.S.C. §§ 548, 549, 550, and 551.

JURISDICTION, VENUE AND STANDING

1. This Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. §§ 157, and 1334, and Rule 77.4(a) of the Local Rules of the United States District Court for the District of New Hampshire.

2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (H).

3. Venue is proper in the District of New Hampshire pursuant to 28 U.S.C. § 1409.

4. Pursuant to AO 7008-1, the Plaintiff consents to the entry of a Final Order and/or Final Judgment by this Bankruptcy Court.

PARTIES

5. The plaintiff, Olga L. Gordon, is the Chapter 7 Trustee (the "Plaintiff" or "Trustee") of the bankruptcy estate of the above captioned Debtor's bankruptcy estate.

6. The defendant Kingdom Communications, Inc. ("Kingdom Communications"), upon information and belief, is an Indiana corporation, with a mailing address of 201 S Shady Shores Drive, Unit 1952, Lake Dallas, Texas 75065.

7. The defendant Barbara Brown, a/k/a Barbara Volz a/k/a Barbara Taylor ("Brown") is an individual with a last known residential address of 201 S Shady Shores Drive, Unit 1952, Lake Dallas, Texas 75065. Upon information and belief, Brown is the principal officer of Kingdom Communications.

GENERAL ALLEGATIONS

8. On April 20, 2018, Claudia G. Gabrielle (the "Debtor") filed a voluntary petition pursuant to Chapter 7 of 11 U.S.C. §§ 101-1330 (the "Bankruptcy Code").

9. On April 20, 2018, the Trustee was appointed as the Chapter 7 Trustee of the Debtor's bankruptcy estate.

THE DEBTOR'S FINANCIAL CONDITION

A. The Debtor's Real Property Assets

10. According to the Debtor's Schedule A/B, the Debtor lists ownership of a condominium located at 500 Waters Edge Drive, Unit 322, Lake Dallas, Texas, 75065 ("Unit 322") and values Unit 322 at \$390,000.

11. Upon information and belief, the fair market value of Unit 322 is less than \$390,000.

12. Upon information and belief, as of the date of the Debtor's petition, Unit 322 was encumbered by a mortgage in the amount of \$362,047.

13. According to available land records, the Debtor acquired title to Unit 322 on or about March 10, 2017.

14. According to available land records, on March 3, 2017, the Debtor granted Brown power of attorney over her real property, including Unit 322 and her banking and financial institution accounts (the "March 2017 POA").

15. According to the March 2017 POA, the Debtor lists Brown as her mother.

16. Upon information and belief, Brown is not the Debtor's mother.

17. Upon information and belief, Brown, through her power of attorney over the Debtor's financial affairs, executed a mortgage against Unit 322, in the amount of \$367,000.

18. According to available land records, the Debtor no longer maintains any ownership interest in Unit 322 as the Debtor transferred her interest in Unit 322 to a third party on June 21, 2018.

19. According to the Debtor's Schedule A/B, the Debtor also lists ownership of a condominium located at 500 Waters Edge Drive, Unit 324, Lake Dallas, Texas, 75065 ("Unit 324").

20. According to Schedule A/B, the Debtor values Unit 324, her claimed homestead, at \$438,000.

21. Upon information and belief, the fair market value of Unit 324 is less than \$438,000.

22. Upon information and belief, as of the date of the Debtor's petition, Unit 324 is encumbered by a mortgage in the amount of \$414,487.

23. According to available land records, the Debtor acquired title to Unit 324 on or about December 18, 2017.

24. According to available land records, on November 10, 2017, the Debtor again granted Brown power of attorney over her real property, including Unit 324, and her banking and financial institution accounts (the "November 2017 POA").

25. According to the November 2017 POA, the Debtor lists Brown as her mother.

26. Upon information and belief, Brown is not the Debtor's mother.

27. Upon information and belief, Brown, through her power of attorney over the Debtor's financial affairs, executed a mortgage against Unit 324, in the amount of \$416,100.

28. According to Schedule D, creditors maintain secured claims against the Debtor's estate totaling \$778,053.

29. According to the Debtor's claims register, secured creditors have filed claims totaling \$231,264.13 to date.

30. Upon information and belief, the Trustee is not aware of any other real property owned by the Debtor at any point during the period of the Transfers¹.

B. The Debtor's Personal Property

¹ See Paragraph 52 *infra*.

31. According to Schedule A/B the Debtor lists her personal property with a value of \$111,446.

32. Upon information and belief, the Trustee is not aware of any material change in the value of the Debtor's personal property in 2016.

33. According to Schedule E/F the Debtor lists unsecured claims totaling \$317,550.

34. According to Schedule E/F, the Debtor lists at least one creditor with an outstanding debt as early as 2012 totaling \$22,035.

35. According to Schedule E/F, the Debtor lists multiple creditors with outstanding debt incurred as early as 2015:

Entity	Date Debt Incurred	Amount
Card Services American Airlines AAdvantage	2015	\$4,276.00
CitiCards American Airlines AAdvantage	2015	\$9,577.00
Bank of America	2015	\$30,256.00
Bankers Healthcare Group, LLC	2016	\$111,518.00
Fidelity Investments	2016	\$16,039.00
USAA American Express Card	2016	\$22,675.00
American Express Starwood Preferred Guest	2016	\$1,105.00
Bank of America Visa Signature	2016	\$16,128.00
CitiCards Costco Visa	2016	\$5,000.00
Synchrony Bank Care Credit	2016	\$8,577.00
Synchrony Bank / JC Penney	2016	\$2,208.00
TJX Rewards	2016	\$1,500.00
	TOTAL	\$228,859.00

36. According to Schedule E/F, the Debtor lists additional creditors with outstanding debt incurred in 2017:

Entity	Date Debt Incurred	Amount
Bankers Healthcare Group, LLC	2017	\$59,424.00
Cardmember Services Bankers Healthcare Group	2017	\$5,235.00
	TOTAL	\$64,659.00

37. Upon information and belief, the Debtor was insolvent at all relevant times in 2016.

38. Upon information and belief, the Debtor was insolvent at all relevant times in 2017.

THE DEBTOR'S CLOSE RELATIONSHIP WITH THE DEFENDANTS

39. Upon information and belief, Brown maintains a website at <http://www.barbarabrown.com>, which includes a webpage for Kingdom Communications.

40. Upon information and belief, in addition to serving as the principal officer of Kingdom Communications, Brown is the president and sole director of BGB Worldwide, Inc., a corporate umbrella which includes self-help programs including, without limitation, "Whole Life Whole Health" and "Be Made Whole."

41. Upon information and belief, Kingdom Communications is an affiliate of BGB Worldwide, Inc.

42. According to the Internal Revenue Service's (the "IRS") publicly available Tax Exempt Organizational Search, Kingdom Communications first filed for tax exempt status in 2009.

43. According to the IRS's publicly available Tax Exempt Organizational Search, Kingdom Communications last filed tax returns for Kingdom Communication in 2015.

44. According to the IRS's publicly available Tax Exempt Organizational Search, as of 2015, Kingdom Communications claimed gross receipts of not greater than \$50,000.00.

45. According to the IRS's publicly available Tax Exempt Organizational Search, Kingdom Communications has never claimed gross receipts in excess of \$50,000.00 in any given year.

46. According to publicly available information accessible online through the Texas Comptroller of Public Accounts, Kingdom Communications was incorporated in Indiana.

47. Upon information and belief, Kingdom Communications' corporate status has been dissolved since at least 2013.

48. Upon information and belief, because Kingdom Communications' corporate status lapsed, there has existed and still exists a unity of interest between defendants, and each of them, such that any individuality and separateness between them ceased, and each is the alter ego of the other.

49. Upon information and belief, as articulated above, the defendants have not observed corporate formalities with respect to Kingdom Communications.

50. Upon information and belief, according to a video accessible on YouTube, titled "My Road Back 'to Health' - Claudia Gabrielle, MD FAAFP," the Debtor developed a relationship with Brown beginning on or about March 2010.

51. According to the Debtor's Statement of Financial Affairs the Debtor states that Kingdom Communications helped save her life.

52. Upon information and belief, the Debtor has publicly appeared on behalf of Brown's organizations, including "Whole Life Whole Health."

53. Upon information and belief, the Debtor listed Brown as her mother on both the March 2017 POA and November 2017 POA.

THE DEBTOR'S FRAUDULENT TRANSFERS

54. Upon information and belief, the Debtor did not owe any debt to Kingdom Communications at any time during 2016.

55. Upon information and belief, the Debtor did not owe any debt to Kingdom Communications at any time during 2017.

56. Upon information and belief, the Debtor did not receive any property from any of the Defendants in return for her transfers in 2016.

57. Upon information and belief, the Debtor did not receive any property from any of the Defendants in return for her transfers in 2017.

58. Within 2 years of the Petition Date, the Debtor made the following transfers to Kingdom Communications:

Date	Amount (\$)	Check No.
4/13/2018	6,000.00	1517
3/30/2018	6,000.00	1512
3/15/2018	4,500.00	1510
2/28/2018	6,000.00	1508
1/31/2018	5,200.00	1505
2/15/2018	4,300.00	1506
1/12/2018	10,000.00	1502
12/29/2017	5,000.00	1501
12/15/2017	1,500.00	1497
12/15/2017	1,500.00	1500

11/21/2017	2,500.00	1494
12/8/2017	4,500.00	1492
9/6/2017	10,000.00	1483
11/30/2017	39,500.00	1496
11/6/2017	700.00	1490
10/13/2017	2,000.00	1487
9/15/2017	2,500.00	1484
9/29/2017	6,300.00	1486
8/31/2017	5,500.00	1482
8/16/2017	7,500.00	1481
11/15/2017	3,000.00	1491
7/31/2017	5,500.00	1476
10/30/2017	4,500.00	1488
5/1/2017	46,911.29	1453
5/16/2017	3,500.00	1457
5/30/2017	2,850.00	1462
6/15/2017	5,500.00	1463
7/6/2017	50,000.00	1469
7/17/2017	5,000.00	1470
6/30/2017	3,500.00	1452
5/30/2017	5,000.00	1461
3/17/2017	10,000.00	1441
3/1/2017	2,222.22	1438
2/15/2017	4,400.00	1433
2/1/2017	4,500.00	1431
4/17/2017	4,000.00	1450
4/3/2017	4,000.00	1448
1/17/17	4,000.00	1426
1/4/2017	1,900.00	1422
11/17/2016	24,000.00	wire
12/30/2016	2,850.00	1416
12/30/2016	4,000.00	1414
12/15/2016	4,000.00	1410
12/12/2016	2,850.00	1409
11/30/2016	3,500.00	1402
10/11/2016	2,700.00	1387
10/31/2016	3,300.00	1355
10/27/2016	800.00	1392
10/27/2016	3,500.00	1391
10/27/2016	2,700.00	1393
11/8/2016	2,850.00	1398
11/4/2016	700.00	1396
10/14/16	3,000.00	1384

10/14/2016	1,300.00	1385
7/11/2016	1,800.00	1356
9/16/2016	1,300.00	1375
9/16/2016	2,500.00	1374
8/17/2016	3,000.00	1366
8/30/2016	2,500.00	1370
8/9/2016	1,600.00	1357
10/3/2016	2,800.00	1378
10/3/2016	1,500.00	1379
10/3/2016	2,850.00	1380
9/6/2016	1,300.00	1371
5/25/2016	28,732.00	1342
7/6/2016	2,800.00	1350
7/6/2016	1,800.00	1351
8/1/2016	1,800.00	1362
8/1/2016	2,800.00	1361
6/17/2016	1,700.00	1347
6/17/2016	2,700.00	1346
6/1/2016	2,700.00	1343
6/1/2016	1,700.00	1344
5/3/2016	2,500.00	1333
5/3/2016	1,500.00	1334
5/16/2016	2,500.00	1337
5/16/2016	1,500.00	1338

TOTAL	\$439,215.51
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59. The total amount transferred to Kingdom Communications is \$439,215.51 (the “Transfers”).

60. Upon information and belief, all of the Transfers occurred after the dissolution of Kingdom Communications.

61. According to the Trustee’s investigation to date, all of the Transfers were made from a bank account held in the Debtor’s name at Bank of America.

62. According the Trustee’s investigation to date, all of the Transfers were deposited into an account maintained by Kingdom Communications at JPMorgan Chase Bank, N.A.

63. According to the Trustee's investigation to date, a review of the Debtor's schedules and financial information indicates that the Debtor transferred substantially all of her after tax income to Kingdom Communications in 2016 and 2017.

64. Upon information and belief, throughout the period of the Transfers the Debtor had monthly expenses of \$13,033, exclusive of purported charitable donations.

65. According to the Debtor's testimony at the Section 341 Meeting, the Debtor's after tax income is approximately \$18,000 per month or \$216,000 per year for the last several years.

66. According to the tax returns provided by the Debtor to the Trustee, the Debtor's 2016 tax returns show a gross income of \$321,492.

67. According to the Trustee's investigation to date, the Trustee has identified transfers totaling \$137,932 from the Debtor to the Defendants in 2016.²

68. Upon information and belief, the Debtor's payment of expenses and transfers to the Defendants totaled \$294,328 in 2016.

69. Upon information and belief during, the Debtor was not current in her payment to creditors during 2016.

70. According to the Trustee's investigation to date, the Trustee has identified transfers totaling \$259,283.51 from the Debtor to the Defendants in 2017.³

71. Upon information and belief, the Debtor's payment of expenses and transfers to the Defendants totaled \$415,679.51 in 2017.

² According to the Debtor's Statement of Financial Affairs, the Debtor attests to transferring \$244,547 to Kingdom Communications in 2016

³ According to the Debtor's Statement of Financial Affairs, the Debtor attests to transferring \$283,105 to Kingdom Communications in 2017.

72. Upon information and belief during, the Debtor was not current in her payment to creditors during 2017.

73. The Debtor further testified as follows during the Section 341 Meeting:
“Trustee: Are you basically giving most of your money to this organization?

Debtor: I do more than tithing, yes...”

74. Upon information and belief, the Trustee is unaware of any change in employment for the Debtor during 2016.

75. Upon information and belief, the Debtor was insolvent at the time of each and every one of the Transfers.

76. The Debtor has additionally made at least four transfers to Kingdom Communications post-petition as follows (the “Post-Petition Transfers”):

Date	Amount (\$)	Check No.
5/31/2018	1,200.00	1527
6/1/2018	10,000.00	1529
5/15/2018	7,500.00	1524
4/30/2018	4,500.00	1520
TOTAL:	\$23,200	

77. Upon information and belief, Brown collected the Transfers and Post-Petition Transfers.

COUNT I

(Avoidance and Recovery of the Transfers as Fraudulent Transfers Pursuant to 11 U.S.C. §§ 548(a)(1)(B), 550, 551)

78. The Trustee reasserts and realleges paragraphs 1 through 75 as if fully set forth herein.

79. Within two (2) years prior to the Petition Date, the Debtor made the Transfers to Kingdom Communications.

80. Kingdom Communications was the initial transferee of the Transfers.

81. The Debtor received less than reasonably equivalent value in exchange for the Transfers.

82. Upon information and belief, the Debtor did not owe any outstanding debts to the Defendants at the time of the Transfers.

83. Upon information and belief, the Debtor did not receive any property in return for the Transfers.

84. According to available records, the Debtor transferred funds to the Defendants in excess of her income in each and every month in 2016 and 2017:

Date	Amount	Check No.	Monthly Total of transfers	Expenses from Schedule J (Not including estimated charitable gifting of \$7,200)	Monthly Net Income per Debtor's 341 Testimony	Excess/Deficiency
5/3/2016	\$2,500.00	1333	\$36,732.00	\$13,033.00	\$18,000.00	-\$31,765.00
5/3/2016	\$1,500.00	1334				
5/16/2016	\$2,500.00	1337				
5/16/2016	\$1,500.00	1338				
5/25/2016	\$28,732.00	1342				
6/1/2016	\$2,700.00	1343	\$8,800.00	\$13,033.00	\$18,000.00	-\$3,833.00
6/1/2016	\$1,700.00	1344				
6/17/2016	\$1,700.00	1347				
6/17/2016	\$2,700.00	1346				
7/6/2016	\$2,800.00	1350	\$6,400.00	\$13,033.00	\$18,000.00	-\$1,433.00
7/6/2016	\$1,800.00	1351				
7/11/2016	\$1,800.00	1356				
8/1/2016	\$1,800.00	1362	\$11,700.00	\$13,033.00	\$18,000.00	-\$6,733.00
8/1/2016	\$2,800.00	1361				
8/9/2016	\$1,600.00	1357				
8/17/2016	\$3,000.00	1366				
8/30/2016	\$2,500.00	1370				
9/6/2016	\$1,300.00	1371	\$5,100.00	\$13,033.00	\$18,000.00	-\$133.00
9/16/2016	\$1,300.00	1375				
9/16/2016	\$2,500.00	1374				
10/3/2016	\$2,800.00	1378	\$24,450.00	\$13,033.00	\$18,000.00	-\$19,483.00

10/3/2016	\$1,500.00	1379				
10/3/2016	\$2,850.00	1380				
10/11/2016	\$2,700.00	1387				
10/14/2016	\$3,000.00	1384				
10/14/2016	\$1,300.00	1385				
10/27/2016	\$800.00	1392				
10/27/2016	\$3,500.00	1391				
10/27/2016	\$2,700.00	1393				
10/31/2016	\$3,300.00	1355				
11/4/2016	\$700.00	1396	\$31,050.00	\$13,033.00	\$18,000.00	-\$26,083.00
11/8/2016	\$2,850.00	1398				
11/30/2016	\$3,500.00	1402				
11/17/2016	\$24,000.00	wire				
12/15/2016	\$4,000.00	1410	\$10,850.00	\$13,033.00	\$18,000.00	-\$5,883.00
12/30/2016	\$2,850.00	1416				
12/30/2016	\$4,000.00	1414				
Date	Amount	Check No.	Monthly Total of Transfers	Expenses from Schedule J (Not including estimated charitable gifting of \$7,200)	Monthly Net Income per Debtor's 341 Testimony	Excess/Deficiency
12/29/2017	\$5,000.00	1501	\$12,500.00	\$13,033.00	\$18,000.00	-\$7,533.00
12/15/2017	\$1,500.00	1497				
12/15/2017	\$1,500.00	1500				
12/8/2017	\$4,500.00	1492				
11/30/2017	\$39,500.00	1496	\$45,700.00	\$13,033.00	\$18,000.00	-\$40,733.00
11/21/2017	\$2,500.00	1494				
11/15/2017	\$3,000.00	1491				
11/6/2017	\$700.00	1490				
10/30/2017	\$4,500.00	1488	\$6,500.00	\$13,033.00	\$18,000.00	-\$1,533.00
10/13/2017	\$2,000.00	1487				
9/29/2017	\$6,300.00	1486	\$18,800.00	\$13,033.00	\$18,000.00	-\$13,833.00
9/15/2017	\$2,500.00	1484				
9/6/2017	\$10,000.00	1483				
8/31/2017	\$5,500.00	1482	\$13,000.00	\$13,033.00	\$18,000.00	-\$8,033.00
8/16/2017	\$7,500.00	1481				
7/31/2017	\$5,500.00	1476	\$60,500.00	\$13,033.00	\$18,000.00	-\$55,533.00
7/17/2017	\$5,000.00	1470				
7/6/2017	\$50,000.00	1469				
6/30/2017	\$3,500.00	1452	\$9,000.00	\$13,033.00	\$18,000.00	-\$4,033.00
6/15/2017	\$5,500.00	1463				
5/30/2017	\$2,850.00	1462	\$58,261.29	\$13,033.00	\$18,000.00	-\$53,294.29
5/30/2017	\$5,000.00	1461				

5/16/2017	\$3,500.00	1457				
5/1/2017	\$46,911.29	1453				
4/17/2017	\$4,000.00	1450	\$8,000.00	\$13,033.00	\$18,000.00	-\$3,033.00
4/3/2017	\$4,000.00	1448				
3/17/2017	\$10,000.00	1441	\$12,222.22	\$13,033.00	\$18,000.00	-\$7,255.22
3/1/2017	\$2,222.22	1438				
2/15/2017	\$4,400.00	1433	\$8,900.00	\$13,033.00	\$18,000.00	-\$3,933.00
2/1/2017	\$4,500.00	1431				
1/4/2017	\$1,900.00	1422	\$5,900.00	\$13,033.00	\$18,000.00	-\$933.00
1/17/17	\$4,000.00	1426				

85. Upon information and belief, at the time the Debtor made the Transfers, the Debtor was insolvent or became insolvent as a result of the Transfers.

86. Upon information and belief, at the time the Debtor made the Transfers, the Debtor was engaged in a business for which any property remaining was an unreasonably small capital.

87. Upon information and belief, at the time the Debtor made the Transfers, the Debtor intended that she would incur, or believed or reasonably should have believed that she would incur debts beyond her ability to repay them as they became due.

88. The Transfers may be avoided by the Trustee as fraudulent transfers pursuant to the provisions of 11 U.S.C. § 548(a)(1)(B), and recovered from the Defendants and preserved for the Debtor's bankruptcy estate pursuant to the provisions of 11 U.S.C. § 550 and 551.

COUNT II

(Avoidance and Recovery of the Post-Petition Transfers Pursuant to 11 U.S.C. §§ 549, 550, 551)

89. The Trustee repeats and realleges paragraphs 86 of this Complaint and incorporates them herein.

90. The Post-Petition Transfers were post-petition transfers of estate property in the total amount of \$23,200.

91. The Post-Petition Transfers were not authorized by the Bankruptcy Court or any provision of the Bankruptcy Code.

92. The Defendants were the initial transferee of the Post-Petition Transfers.

93. The Post-Petition Transfers may be avoided by the Trustee as a fraudulent transfer pursuant to the provisions of 11 U.S.C. § 549, and it or its value recovered from Kingdom Communications and preserved for the Debtor's bankruptcy estate pursuant to the provisions of 11 U.S.C. § 550 and 551.

COUNT III

(Piercing the Corporate Veil of Kingdom Communications)

94. The Trustee reasserts and realleges paragraphs 1 through 91 as if fully set forth herein.

95. Upon information and belief, Kingdom Communications has not maintained an active corporate status since 2013.

96. Upon information and belief, Kingdom Communications has not filed non-profit tax returns since 2015.

97. Upon information and belief, Brown is the principal officer of Kingdom Communications.

98. Upon information and belief, Brown operated and controlled Kingdom Communications for her own personal benefit without regard to corporate

formalities, such that the business of Kingdom Communications and Brown were one and the same.

99. The Trustee is entitled to a declaratory judgment piercing Kingdom Communications' corporate veil, which is necessary to remedy an injustice upon the Debtor's creditors.

WHEREFORE, Olga L. Gordon, Chapter 7 Trustee respectfully requests that this Court enter an order and judgment as follows:

a) Under **Count I**, the Transfers may be avoided by the Trustee as fraudulent transfers pursuant to the provisions of 11 U.S.C. § 548(a)(1)(B), and recovered from the Defendant and preserved for the Debtor's bankruptcy estate pursuant to the provisions of 11 U.S.C. § 550 and 551;

b) Under **Count II**, the Post Petition Transfers may be avoided by the Trustee pursuant to the provisions of 11 U.S.C. § 549, and recovered from the Defendant and preserved for the Debtor's bankruptcy estate pursuant to the provisions of 11 U.S.C. § 550 and 551;

c) Under **Count III**, for a declaratory judgment piercing the corporate veil of Kingdom Communications and that the Transfers are recoverable from Brown; and

d) Grant such other and further relief this Court deems just and proper.

Respectfully submitted,

**OLGA L. GORDON, CHAPTER 7
TRUSTEE,**

/s/ Olga L. Gordon

Olga L. Gordon, Esq. BNH#06338

Anthony Leone, Esq. (*pro hac vice admitted*)

Murtha Cullina LLP

99 High Street

Boston, Massachusetts 02110

617-457-4000 Telephone

617-482-3868 Facsimile

ogordon@murthalaw.com

Dated: December 28, 2018